

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Civil Action No. 03-40266 - FDS

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AMERICAN MANUFACTURERS MUTUAL
INSURANCE COMPANY,

Plaintiff

v.

TOWN OF NORTH BROOKFIELD,

Defendant

U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JOINT SCHEDULING
CONFERENCE STATEMENT

I. DISCOVERY

A. Phase I

The parties agree to exchange voluntary disclosures pursuant to Fed. R. Civ. P.

26(a)(1)(A), (B), (C) and (D) by July 30, 2004.

B. Phase II

1. Written discovery requests served by August 31, 2004 and responses by October 29, 2004.
2. Depositions completed by February 25, 2005.
3. The parties shall simultaneously exchange written expert reports by April 8, 2005.
4. Expert depositions completed by May 6, 2005.
5. No change in the limitations on discovery are needed, except that expert depositions shall not count toward the per party deposition limit.

II. MOTION SCHEDULE

1. The parties propose that all dispositive motions be filed by June 6, 2005.
2. Opposition to dispositive motions shall be served within 30 days after receipt of the motion.
3. Any reply briefs may be filed 15 days after receipt of an opposition.

III. EXTENSION OF TIME

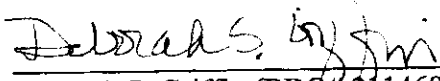
The parties request that the Court permit them to stipulate to a modest extension of deadlines outlined above if circumstances warrant such an extension.

IV. TRIAL BY MAGISTRATE

The parties consent to trial by a magistrate judge.


AMERICAN MANUFACTURERS MUTUAL
INSURANCE COMPANY

By its attorneys,


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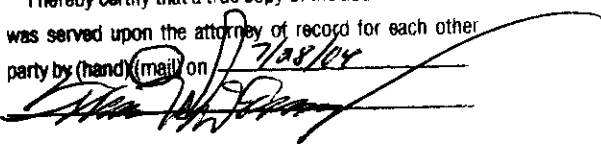
DEFENDANT
TOWN OF NORTH BROOKFIELD

By its attorneys,

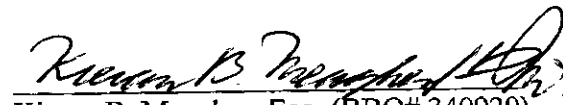

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document
was served upon the attorney of record for each other
party by (hand) (mail) on 7/28/04



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